

11/15/99

Food & Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

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re: FDA Docket No. 99D-4488 and 99D-4489
Dockets Management Branch (HFA - 305),

I realize that food-borne illness is of great concern. As the parent of a 5-year old and a frequent shopper and eater, I choose my foods very carefully. I want to maintain a healthy and nutritious diet for my entire family. To that end, I avoid overprocessed foods and I select organic products, especially produce, because this is better both for my family and this planet.

We eat a fair amount of sprouts in this household, so the recent illnesses linked to pathogenic contamination of sprouts has been of great concern. After researching this phenomenon, we have concluded, as have many more astute scientists, that certified organic seed is the best way to provide a safe source for sprouts. As the FDA must know, certified organic seed has never been linked to a microbial outbreak.

It is my impression that the FDA exists to protect consumers from tainted products, to guarantee that producers of pharmaceuticals and foods maintain necessary standards of quality and safety. I would offer that the FDA needs a broad view in regards to organic products in general and organic sprouts in particular. Organic farmers, usually small producers of limited financial resources, offer uniquely healthy products for us consumers, rare alternatives to the vastly more prevalent chemical farming that dominates my grocery store. As a consumer, I want to see these small organic producers nurtured, not molested! If such products are to continue to be offered, FDA's guidance needs to be created with care and finesse.

The current FDA Guidance threatens to destroy the tiny organic sprout industry, which already offers a healthy and safe product. That these small organic growers would be forced to maintain on-site labs and rinse safe organic products in bleach is absolutely outrageous! If the seed source is safe, and certified organic seeds are known to be safe, then why force sprout growers to use a carcinogenic poison on their product?

The FDA should establish guidelines for the production of seed intended for human consumption. The FDA would certify the seed, as is done with meat (i.e. Grade A). Sprout **growers** would need to buy either seed certified for human consumption and/or certified organic seed and must be able to produce proof of certification upon demand. Until such time as the supply of safe seed reaches levels necessary to satisfy the demand, sprout growers should have the option of sterilizing their seed and lab testing to assure absence of pathogens - as outlined in the guidance.

The FDA should contract the advice and help of certified organic seed farmers to establish methods which will make the conventional farming of seed for human consumption as safe as the certified organic method. Additionally, the FDA should add to the Guidance a clause which states: "Certified Organic as well as seed certified by FDA as for human consumption is considered an acceptable alternative approach to prevention of microbial hazards in sprouted seeds."

By allowing sprout growers to use seed fit for human consumption the small growers can survive. The big growers will still have the option of buying any seed, as long as they fulfill the sterilization and lab testing requirements outlined in the guidance.

Sincerely,



Brenda Hartman
3005 Panaview Blvd
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99D-4488

99D-4489

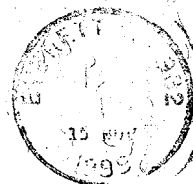
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CROSS FILE SHEET

File Number: 99D-4488/C *12*

See File Number: 99D-4489/C *12*

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